

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

KOREA ADVANCED INSTITUTE OF
SCIENCE AND TECHNOLOGY

Plaintiff,

v.

KIP CO., LTD. f/k/a KAIST IP Co., Ltd.;
P&IB CO., LTD.;
IN GYOO KANG;
KIPB LLC f/k/a KAIST IP US LLC;
PAULINA FUNDINGCO, LLC; and
U.S. BANK NATIONAL ASSOCIATION

CASE NO.: 2022-CV-00317

Defendants.

CIVIL L.R. 3(b) NOTICE OF RELATED ACTION

PLEASE TAKE NOTICE THAT, in accordance with Civil Local Rule 3(b), this case is related to *Korea Advanced Institute of Science and Technology v. KIP Co., Ltd. f/k/a KAIST IP Co., Ltd., et al*, Circuit Court of Milwaukee County Case No. 2022CV001342.

An action is related to another when the actions: (i) arise from substantially the same transaction or events; (ii) involve substantially the same parties or property; (iii) involve the same patent, trademark or copyright; or (iv) for other reasons would entail substantial duplication of effort or risk inconsistent or contradictory results if heard by different judges. Civil L. R. 3.

First, the actions arise from substantially the same transaction or events because both actions relate to a dispute over the same proceeds from the same patent litigation funding agreement. In both actions, Plaintiff Korea Advanced Institute of Science and Technology seeks remedies based on alleged breaches of a business agreement to share proceeds from patents related to FinFET technology. Second, the actions involve all of the same parties and relate to a dispute

regarding the same property; namely, the assets in an escrow account. Third, the actions involve the same patents, Korean Patent No. 10-0458288 and U.S. Patent No. 6,885,055. Fourth, the actions involve exactly the same factual issues and legal claims.

Dated: March 12th, 2022

Respectfully submitted,

/s/ Steven M. Biskupic

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of March, 2022, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the foregoing was served by electronic delivery to the following registrants:

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